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April 20, 2012

US EPA Office of Pollution Prevention and Toxics EPA East Building Room 6428 Attn: Section 8(e) 1201 Constitution Avenue, NW Washington, DC 20004



Cc: Polymer Chemicals bv
Arkema France
Pergan GmbH
United Initiators GmbH & Co. KG



SUBJECT: TSCA 8(e) Notice

Re: Ames Test on Bis(2,4-dichlorobenzoyl) peroxide (CAS# 133-14-2), paste, 50% in silicone oil

Dear TSCA Section 8(e) Coordinator:

On behalf of Akzo Nobel Polymer Chemicals LLC we are submitting preliminary results on an OECD 471 "Bacterial Reverse Mutation Test" with Bis(2,4-dichlorobenzoyl) peroxide (CAS# 133-14-2), paste, 50% in silicone oil. The paste typically contains silicone oil (polydimethylsiloxanes, CAS # 63148-62-9) at 49 – 51%. The study was sponsored by Akzo Nobel Polymer Chemicals by, Arkema France, Pergan GmbH and United Initiators GmbH & Co. KG.

The test was conducted with bacterial strains TA100, TA1535, TA98, TA1537, WP2uvrA with and without S9 at 50 to 5000 ug test article/plate.

In the first experiment (plate incorporation method) there were small but statistically significant increases in the frequency of TA100, TA1535 and TA98 revertant colonies at the upper dose levels of the test item in the absence of metabolic activation (S9) only with a modest doseresponse relationship observed for TA100 and TA98.

The test item induced a toxic response in the second experiment after employing pre-incubation methodology (20 minutes at 37°C) and the responses noted in the first experiment were, therefore, not reproduced.

Therefore, an additional (confirmatory) experiment was performed (employing plate incorporation methodology as in Experiment 1) using those bacterial strains that showed a statistically significant increase (TA100, TA1535 and TA98 in the absence of S9-mix only). In this experiment, there were no meaningful increases in colony frequency noted for TA100 and TA1535 but dose-related and reproducibly statistically significant increases in the frequency of TA98 revertant colonies at the upper dose levels of the test item (3000, 4000 and 5000 µg/plate). The individual numbers of revertant colonies at the statistically significant dose levels were generally above the upper limit of the test laboratory's vehicle/untreated historical control

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